

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ALAN KWANG,

Plaintiff.

v.

ROYAL CANIN USA, INC., et al.

Defendants.

Case No. 2:18-cv-00178-MJP

Hon. Marsha J. Pechman

**STIPULATION AND [PROPOSED]
ORDER REQUESTING
CONTINUANCE OF DISCOVERY
CUTOFF**

Noting Date: December 14, 2018

1 Plaintiff, ALAN KWANG, and Defendant, ROYAL CANIN USA, INC.,
2 hereby stipulate as follows:

3 WHEREAS, the trial date currently set for this matter is May 13, 2019, and
4 the current discovery cutoff date is December 14, 2018.

5 WHEREAS, the Parties have been diligent in their pursuit of discovery,
6 having exchanged and responded to written discovery requests and taking the
7 depositions of key witnesses.

8 WHEREAS, the scheduling of witness depositions was difficult due to the
9 place of residence of the witnesses along with calendaring conflicts of the witnesses
10 and the attorneys in this matter.

11 WHEREAS, during witness depositions, the existence of documents and
12 information, potentially relevant to this litigation, was brought to light and the
13 witnesses provided contradictory testimony regarding these documents and
14 information.

15 WHEREAS, considering this information, the Parties agree to a continuance
16 of the discovery cutoff to January 14, 2019, to allow for a written request to be made
17 of these documents and information.

18 WHEREAS, this is the first request for a continuance of any date in this
19 action and the Parties request a short continuance to allow them to complete their
20 discovery. This request will not impact the current trial date.

21 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and
22 between the respective attorneys of record for Plaintiff and Defendant, subject to
23 the Court's approval as follows:

- 24 1. That the current discovery cutoff date of December 14, 2018,
25 shall be continued to January 14, 2019;

1
2. That all other dates set by the June 19, 2018 Order Setting Trial
2
shall remain unchanged.

3 **IT IS SO STIPULATED.**

4 Dated: December 14, 2018

Defiance Law PLLC

5 /s/Kevin P. Smith
6 Kevin P. Smith, WSBA No. 48578
7 Attorney for Plaintiff

8 Harbor Law PLLC

9 /s/Angie Lee
10 Angie Lee, WSBA No. 47104
11 Attorney for Plaintiff

12 Town Center Law

13 /s/Attila Dennes
14 Attila Denes, WSBA No. 40436
15 Attorney for Plaintiff

16 Dated: December 14, 2018

17 Barran Liebman LLP

18 /s/Andrew M. Schpak
19 Andrew M. Schpak, WSBA No. 39901
20 Attorney for Defendant

21 Harmon & Davies, P.C.

22 /s/Laura B. Gallagher
23 Laura B. Gallagher, Admitted *Pro Hac
Vice*
24 Attorney for Defendant

ORDER

The Court has considered the above stipulation of the parties. The stipulation is hereby adopted by the Court.

Dated: December 18, 2018

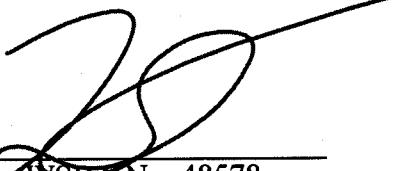

Hon. Marsha J. Pechman

Hon. Marsha J. Pechman

1
2 **CERTIFICATE OF SERVICE**
3
4

5 I hereby certify that on December 14, 2018, I electronically filed the foregoing
6 with the Clerk of the Court using the CM/ECF system which will send notification of
7 such filing to the parties of record in the above case.
8

9 DATED at Tacoma, Washington this 14th day of December, 2018.
10

11 
12 _____
13 Kevin Smith, WSBA No. 48578
14 1115 Tacoma Ave. S.
15 Tacoma, WA 98402
16 Telephone: (253) 507-4769
17 Email: k.smith@defiance.law
18 Attorney for Plaintiff Alan Kwang
19
20
21
22
23
24
25
26